

**MDL 1570 PLAINTIFFS' EXECUTIVE COMMITTEES**

In re: Terrorist Attacks on September 11, 2001 (S.D.N.Y.)

| <b>Plaintiffs' Executive Committee for Personal Injury and Death Claims</b>  | <b>Plaintiffs' Executive Committee for Commercial Claims</b>  |
|--|---|
| Ronald L. Motley (1944-2013)<br>Jodi Westbrook Flowers, <i>Co-Chair</i><br>Donald A. Migliori, <i>Co-Chair</i><br>Robert T. Haefele, <i>Liaison Counsel</i><br>MOTLEY RICE LLC | Stephen A. Cozen, <i>Co-Chair</i><br>Sean Carter, <i>Co-Chair</i><br>J. Scott Tarbutton, <i>Liaison Counsel</i><br>COZEN O'CONNOR |

**VIA ECF**

April 25, 2025

The Honorable George B. Daniels, U.S. District Judge  
United States District Court for the S.D.N.Y.  
Daniel P. Moynihan U.S. Courthouse  
500 Pearl Street  
New York, NY 10007

Re: *In Re: Terrorist Attacks on September 11, 2001*, 03 MDL 1570 (GBD) (SN)

Dear Judge Daniels:

The Plaintiffs' Executive Committees and counsel for the *Ashton* Plaintiffs ("Plaintiffs") are continuing to file publicly (in successive tranches) the Exhibits to Plaintiffs' briefs and averments in opposition to Saudi Arabia's motion to dismiss. *See e.g.* ECF Nos. 9885, 9936, 9944, 9973, and 10199. Pursuant to the Court's July 29, 2024 Order, ECF No. 10173, all of Plaintiffs' Exhibits are "judicial documents" to which public access attaches, *Id.* at 9-11, and Plaintiffs are filing them publicly as soon as practicable, subject to only "limited redactions," *Id.* at 1.

Further to Plaintiffs' meet-and-confer process with DOJ/FBI, Plaintiffs are proceeding to file on the public docket certain judicial documents containing material originally produced subject to the FBI protective order. These exhibits comprise documents with FBI production numbers, which are now "Redacted for Public Filing" to comply with the Court's orders.

Plaintiffs are filing the following four (4) judicial documents with FBI production ranges on the public docket as attachments to the present letter:

| <b>Attachment to ECF filing</b> | <b>Pls. Exhibit No.</b> | <b>Bates / Production No.</b> |
|---------------------------------|-------------------------|-------------------------------|
| (1)                             | Pls. Ex. 528_ ppr       | FBI 4139-46                   |
| (2)                             | Pls. Ex. 531_ ppr       | FBI 4259                      |
| (3)                             | Pls. Ex. 532_ ppr       | FBI 4270                      |
| (4)                             | Pls. Ex. 574_ ppr       | FBI 4273                      |

The Honorable George B. Daniels  
April 25, 2025  
Page 2

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Plaintiffs are filing these documents with certain provisional redactions, including: provisional redactions to telephone numbers and other data; and provisional redactions requested by the FBI in the course of reviewing the documents for public filing.

All Plaintiffs' judicial documents that include Plaintiffs' provisional redactions ("ppr") are subject to Plaintiffs' reservation of rights to challenge later. ECF No. 9885.

Respectfully submitted,

MOTLEY RICE LLC

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*For the Plaintiffs' Executive Committee for Personal  
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*For the Plaintiffs' Executive Committee for Commercial  
Claims on behalf of Plaintiffs*

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*Attorneys for Ashton Plaintiffs*

cc: The Honorable Sarah Netburn, U.S.M.J.  
All Counsel of Record via ECF